

EXHIBIT 8

From: Ercolini, Michael <mercolini@princelobel.com>
Sent: Monday, March 22, 2021 2:25 PM
To: Andrew S. Bruns
Cc: Matthias Kamber; wgs-singularv.google@wolfgreenfield.com; kvp-singular;
singular@princelobel.com
Subject: RE: Singular Rule 30(b)(6) Notice of Deposition

[EXTERNAL]

Counsel,

I am following up on our meet and confer this afternoon to discuss scheduling of previously noticed depositions for Jeff Dean, Obi Felton, and Jenn Wall, as well as Singular's most recent 30(b)(6) notice. As Google clarified during the call, it does not intend to produce Dean or Felton until Singular has completed its ESI production pursuant to the 220 search terms that Google provided. As we've informed you several times, those terms reach the entirety of Dr. Bates' email correspondence over a ten year period and cover search terms that are unreasonable under any circumstance.

As you further informed us during the call, Google does not intend to produce any witnesses in response to Singular's recent 30(b)(6) notice consisting of 12 topics. Google's reasoning is that it should not have to prepare or produce any witness for those topics unless and until Singular binds itself to not serving notice for any additional topics in the future. As we told you during the call, we are not aware of anything in the discovery order, the Local Rules of the Court, or the Federal Rules of Civil Procedure that so limits Singular's ability to take discovery of Google, while fact discovery is open, under 30(b)(6).

Singular has been more than accommodating in resolving the roadblocks that Google continues to throw up to Singular's taking depositions in this case. In the meantime, the clock continues to tick away toward the close of fact discovery.

Therefore, we ask that Google please provide by no later than tomorrow dates in the first two weeks of April when it will produce Jeff Dean, Obi Felton, Jenn Wall, and a corporate representative prepared to testify on the twelve topics in Singular's most recent 30(b)(6) notice. If Google will not do so, Singular intends to call the court on Wednesday and request a status conference to discuss discovery efforts, and, more particularly, the conduct of depositions in this case. If we do not receive a response with dates by tomorrow, we intend to contact the court on Wednesday at 3 pm ET.

Best regards,

Michael J. Ercolini
617 456 8084 (o) | 617 775 1489 (m)
mercolini@princelobel.com

From: Ercolini, Michael
Sent: Monday, March 22, 2021 2:15 PM
To: Andrew S. Bruns <abrun@keker.com>
Cc: mkamber@keker.com; wgs-singularv.google@wolfgreenfield.com; kvpsingular@keker.com; Singular
<Singular@princelobel.com>
Subject: Re: Singular Rule 30(b)(6) Notice of Deposition

Andrew,

Just confirming for 3 pm ET/noon PT.

Thanks,

Michael Ercolini
Prince Lobel Tye LLP
d: (617) 456-8084
m: (617) 775 1489

On Mar 22, 2021, at 1:25 PM, Andrew S. Bruns <abruns@keker.com> wrote:

Michael,

We are available at 12 PT/3 ET. We can use the following dial-in: 1-877-699-4804; code: 705193.

Thanks,
Andy

Andrew Bruns

Keker, Van Nest & Peters LLP
633 Battery Street
San Francisco, CA 94111-1809
415 962 8821 direct | 415 391 5400 main
abruns@keker.com | [ycard](#) | keker.com
Pronouns: he/him/his

From: Ercolini, Michael <mercolini@princelobel.com>
Sent: Monday, March 22, 2021 9:30 AM
To: Andrew S. Bruns <ABruns@keker.com>
Cc: Matthias Kamber <MKamber@keker.com>; wgs-singularv.google@wolfgreenfield.com; kvp-singular <kvpsingular@keker.com>; singular@princelobel.com
Subject: Re: Singular Rule 30(b)(6) Notice of Deposition

[EXTERNAL]

Andrew,

Please let us know if you're available anytime today between 1:45-3:30 PM ET or between 4:45-6:30 PM ET.

Thank you,

Michael Ercolini
Prince Lobel Tye LLP
617.456.8084 | mercolini@princelobel.com

On Mar 17, 2021, at 11:09 PM, Andrew S. Bruns <abruns@keker.com> wrote:

Michael,

We are unavailable during these windows on Friday. Please provide times next week that work for you.

Best,
Andy

From: Ercolini, Michael <mercolini@princelobel.com>
Sent: Wednesday, March 17, 2021 1:23 PM
To: Andrew S. Bruns <ABruns@keker.com>; Matthias Kamber <MKamber@keker.com>
Cc: wgs-singularv.google@wolfgreenfield.com; kvp-singular <kvpsingular@keker.com>; singular@princelobel.com
Subject: RE: Singular Rule 30(b)(6) Notice of Deposition

[EXTERNAL]

Andrew,

We are available to meet and confer Friday, March 19 anytime between 11 am – 3:30 pm ET and 5:30 pm – 7 pm ET. Please let us know what works in that range. In the meantime, please follow up with dates Google is available for deposition on the 30(b)(6) topics served on March 10, 2021.

Best regards,

Michael J. Ercolini
617 456 8084 direct | mercolini@princelobel.com

From: Andrew S. Bruns [mailto:abruns@keker.com]
Sent: Wednesday, March 10, 2021 9:02 PM
To: Ercolini, Michael <mercolini@princelobel.com>; mkamber@keker.com
Cc: wgs-singularv.google@wolfgreenfield.com; kvpsingular@keker.com; Singular <Singular@princelobel.com>
Subject: RE: Singular Rule 30(b)(6) Notice of Deposition

Michael,

I write in response to the Rule 30(b)(6) notice you served earlier today. We understand that this notice replaces the prior notice, which Singular served on October 2, 2020. Please confirm that understanding is accurate.

We will review the noticed topics and promptly serve formal objections and identify relevant witness(es) as appropriate. As an initial matter, any depositions related to this notice will not proceed on the date you have identified (March 22), but we will be happy to meet and confer as to mutually agreeable dates and times once witnesses have been identified. And, of course, the parties will have to resolve the open issue of deposition logistics.

Best,
Andy

Andrew Bruns

Keker, Van Nest & Peters LLP
633 Battery Street
San Francisco, CA 94111-1809
415 962 8821 direct | 415 391 5400 main
abrun@keker.com | [vcard](#) | keker.com
Pronouns: he/him/his

From: Ercolini, Michael <mercolini@princetonobel.com>
Sent: Wednesday, March 10, 2021 12:54 PM
To: Matthias Kamber <MKamber@keker.com>
Cc: wgs-singularv.google@wolfgreenfield.com; kvp-singular <kvpsingular@keker.com>;
singular@princetonobel.com
Subject: Singular Rule 30(b)(6) Notice of Deposition

[EXTERNAL]

Counsel,

Enclosed for service please find Singular's Rule 30(b)(6) Notice of Deposition of Google LLC.

Best regards,

Michael J. Ercolini
617 456 8084 direct | mercolini@princetonobel.com

This email is intended for the confidential use of the addressees only. Because the information is subject to the attorney-client privilege and may be attorney work product, you should not file copies of this email with publicly accessible records. If you are not an addressee on this email or an addressee's authorized agent, you have received this email in error; please notify us immediately at 617 456 8000 and do not further review, disseminate or copy

this email. Thank you.

IRS Circular 230 Disclosure: Any federal tax advice or information included in this message or any attachment is not intended to be, and may not be, used to avoid tax penalties or to promote, market, or recommend any transaction, matter, entity, or investment plan discussed herein. Prince Lobel Tye LLP does not otherwise by this disclaimer limit you from disclosing the tax structure of any transaction addressed herein.